

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

CLIFFORD CATO

Plaintiff,

v.

UNITED PARCEL SERVICES, INC.

Defendant.

CASE NO. 07-CV-10992

**MOTION TO ADMIT COUNSEL  
PRO HAC VICE**

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District  
Courts for the Southern and Eastern Districts of New York, I, Adam C. Virant, a member  
in good standing of the bar of this Court, hereby move for an Order allowing the  
admission pro hac vice of:

Jeremy M. Cerutti  
Karpf, Karpf, and Virant, P.C.  
3070 Bristol Pike  
Building 2, Suite 231  
Bensalem, PA 19020  
Tel: 215.639.0801  
Fax: 215.639.4970

Jeremy M. Cerutti is a member in good standing of the Bar of the States of New  
Jersey and Pennsylvania. There are no pending disciplinary proceedings against Jeremy  
M. Cerutti in a state or Federal Court.

Dated: May 6, 2008

Respectfully submitted,

KARPF, KARPf & VIRANT, P.C.



Adam C. Virant (AV5429)  
140 Broadway, 46<sup>th</sup> Floor  
New York, NY 10005

JUN 04 2008

9/11-525-6520/1

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

CLIFFORD CATO

Plaintiff,

V.

UNITED PARCEL SERVICES, INC.

Defendant.

CASE NO. 07-CV-10992

**AFFIDAVIT OF  
ADAM C. VIRANT  
IN SUPPORT OF MOTION  
TO ADMIT COUNSEL PRO  
HAC VICE**

State of Pennsylvania )  
 ) ss:  
County of Bucks )

Adam C. Virant, being duly sworn, hereby deposes and says as follows:

1. I am a partner with the law firm of Karpf, Karpf and Virant and counsel for Plaintiff in the above-referenced matter. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Plaintiff's motion to admit Jeremy M. Cerutti as counsel pro hac vice to represent Plaintiff in this matter.

2. I am a member in good standing of the bar of the State of New York, and was admitted to practice in . I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with the Court.

3. I have known Jeremy M. Cerutti since October of 2006.

4. Jeremy M. Cerutti is an Associate attorney with Karpf, Karpf and Virant.

5. I have found Mr. Cerutti to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.

6. Accordingly, I am pleased to move the admission of Jeremy M. Cerutti, pro hac vice.

7. A Certificate of Good Standing issued to Mr. Cerutti by the Pennsylvania Bar is attached hereto as Exhibit A.

8. I respectfully submit a proposed order granting the admission of Jeremy M. Cerutti, pro hac vice, which is attached hereto as Exhibit B.

WHEREFORE, it is respectfully requested that the motion to admit Jeremy M. Cerutti, pro hac vice, to represent Plaintiff in the above captioned matter, be granted.

Dated: May 6, 2008

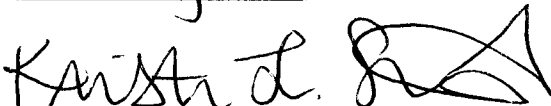
Respectfully submitted,

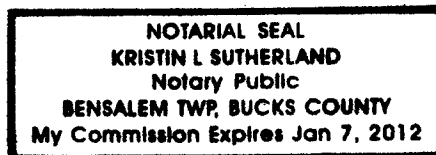
KARPF, KARPF & VIRANT, P.C.



Adam C. Virant (AV5429)  
140 Broadway, 46<sup>th</sup> Floor  
New York, NY 10005

Sworn and subscribe before me  
on this 6 day of  
May, 2008

  
NOTARY PUBLIC



# Exhibit A



Supreme Court of Pennsylvania

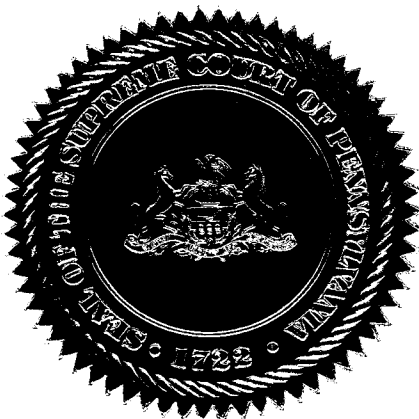
**CERTIFICATE OF GOOD STANDING**

***Jeremy Michael Cerutti, Esq.***

**DATE OF ADMISSION**

***December 13, 2005***

The above named attorney was duly admitted to the bar of the Commonwealth of Pennsylvania, and is now a qualified member in good standing.



Witness my hand and official seal

Dated: May 5, 2008

*Patricia A. Johnson*

Patricia A. Johnson  
Chief Clerk

# Exhibit B

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

CLIFFORD CATO

Plaintiff,

v.

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Defendant.

CASE NO. 07-CV-10992

**ORDER FOR ADMISSION  
PRO HAC VICE  
ON WRITTEN MOTION**

Upon the motion of Adam C. Virant, attorney for Clifford Cato, and said sponsor attorney's affidavit in support:

IT IS HEREBY ORDERED that

Jeremy M. Cerutti  
Karpf, Karpf and Virant, P.C.  
3070 Bristol Pike  
Building 2, Suite 231  
Bensalem, PA 19020

is admitted to practice *pro hac vice* as counsel for Plaintiff, Clifford Cato, in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to The Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF Password at [nysd.uscourts.gov](http://nysd.uscourts.gov). Counsel shall forward the *pro hac vice* fee to the Clerk of Court.

Dated this \_\_\_\_\_ day of \_\_\_\_\_, 2008.

\_\_\_\_\_  
J.

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

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CLIFFORD CATO

Plaintiff,

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Defendant.


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CASE NO. 07-CV-10992

**CERTIFICATE OF SERVICE**

I certify on the date set forth below that I served Defendant with Plaintiff's Motion to Admit Counsel Pro Hac Vice at the following address via first-class mail, postage pre-paid:

Kenneth L. Shaitelman, Esq.  
Akin Gump Strauss Hauer & Feld, LLP  
590 Madison Avenue  
New York, NY 10022

  
Adam C. Virant (AV5429)  
140 Broadway, 46<sup>th</sup> Floor  
New York, NY 10005

Dated: June 2, 2008